

AO 91 (Rev. 08/09) Criminal Complaint

FILED
 UNITED STATES DISTRICT COURT
 ALBUQUERQUE, NEW MEXICO
 OCT 23 2017

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America)

v.)

Hope Lorraine MENDOZA)

Case No.)

MATTHEW J. DYKMAN
 CLERK

171112883

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 22, 2017 in the county of Bernalillo in the
State and District of New Mexico, the defendant(s) violated:

Code Section
 21 U.S.C. § 846

Offense Description
 21 U.S.C. § 846 Any person who attempts or conspires to commit 21 U.S.C. § 841 shall be subject to the same penalties as those prescribed for the offense; and

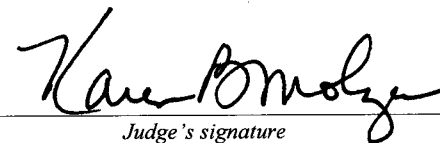
This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.


Jody Harrison, Special Agent, HSI
Printed name and title

Sworn to before me and signed in my presence.

Date: 10/23/2017


Judge's signature

City and state: Albuquerque, NM

Karen B. Molzen, Chief US Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

United States of America

v.

Raul Medas PERES, a.k.a. Jose Raul CAMPOS-Cardona

Hope Lorraine MENDOZA

Sonia GARIBALDI-Bravo

AFFIDAVIT

I, Jody L. Harrison, being duly sworn, hereby depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

1. Your Affiant is a Special Agent (SA) with the Department of Homeland Security, U.S. Immigration & Customs Enforcement (ICE), Homeland Security Investigations (HSI), and has been employed by HSI as such since February, 2012. I am an investigative law enforcement officer of the United States, and I am empowered by law to conduct investigations and make arrests for felony offenses. I have been a federal law enforcement officer for over ten years in total with Homeland Security Investigations and the United States Border Patrol.
2. I have received extensive training and practical experience pertaining to federal criminal procedures, federal criminal statutes, United States Immigration and Nationality law, United States Customs laws and regulations, and other federal and state laws pertaining but not limited to; the importation and distribution of controlled substances pursuant to, bulk cash smuggling, money laundering, asset forfeiture, firearms, and conspiracy. I am authorized, and presently assigned to investigate violations of the Comprehensive Drug Abuse and Prevention and Control Act of 1970, Title 21, United States Code, Section 801, et seq, Title 18 United States Code, Section 922 and other violations of federal law. I have attended the Criminal Investigator Training Program (CITP), and the Immigration and Customs Enforcement Special Agent Training Program (ICE-SAT) at the Federal Law Enforcement Training Center (FLETC) in Brunswick, Georgia.
3. I have also acquired knowledge and information about such offenses, and the various means and methods by which they are furthered from numerous sources, including formal and informal training from other law enforcement officers, investigators, and Special Agents; interviews of informants and arrestees, and interviews of other knowledgeable individuals.

4. The statements contained in this affidavit are based upon your Affiant's investigation, training, experience, and information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, your Affiant has not included each and every fact known to me concerning this investigation. Your Affiant has set forth only the facts that I believe are necessary to establish probable cause to support a criminal complaint against Raul Medas PERES, a.k.a. Jose Raul CAMPOS-Cardona, Hope Lorraine MENDOZA, and Sonia GARIBALDI-Bravo for violations of Title 21, United States Code, § 841 (a)(1) Possession with Intent to Distribute, Methamphetamine.

RELEVANT STATUTES

5. This investigation concerns alleged violations of Title 21, United States Code, § 841 (a) (1) and (b) (1) (A), Title 21 United States Code, § 846 and Title 18, United States Code, § 924 (c)(1)(A)
6. 21 U.S.C. § 841 (a) (1) and (b) (1) (A) prohibits any person knowingly or intentionally to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance, to wit; 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine;
7. 21 U.S.C. § 846 Any person who attempts or conspires to commit 21 U.S.C. § 841 shall be subject to the same penalties as those prescribed for the offense; and

DETAILS OF INVESTIGATION

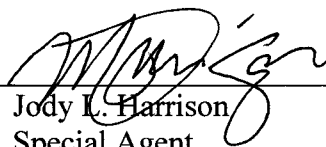
8. On October 22, 2017, agents conducted surveillance at the residence of Raul Medas PERES, a.k.a. Jose Raul CAMPOS-Cardona ("PERES"), 6505 Churchill Rd SW, Albuquerque, NM 87121. PERES was identified as a drug distributor in the Albuquerque, NM area who receives drug shipments from Phoenix, AZ. During this surveillance operation, agents observed a red in color 2016 Hyundai Elantra bearing Arizona license plate number CBM741. The driver of this vehicle was identified as Sonia GARIBALDI-Bravo ("GARIBALDI").
9. On October 22, 2017, at approximately 1210 hours, surveillance observed GARIBALDI arrive at the 6505 Churchill Rd SW in the Hyundai Elantra. At 1213 hours, PERES was observed exiting the residence and walked up to the passenger side of the Hyundai Elantra. PERES opened the rear passenger side door of GARIBALDI's car and retrieved a dark colored bag. PERES carried the dark colored bag into 6505 Churchill Rd SW. Two minutes later, PERES exited the residence with the dark colored bag and placed it into the Hyundai Elantra. PERES went back into the residence, and the Hyundai Elantra departed. Agents believed that GARIBALDI delivered drugs to 6505 Churchill Rd. SW.
10. A few minutes later PERES was observed exiting the residence with a female, later identified as Hope Lorraine MENDOZA ("MENDOZA"). The two drove away from the residence in a grey Dodge truck. A traffic stop was conducted on the grey Dodge truck,

and PERES and MENDOZA were detained while agents obtained a search warrant for the residence.

11. On October 22, 2017, The Honorable Karen B. Molzen, Chief United States Magistrate Judge, for the district of New Mexico authorized a search warrant for 6505 Churchill Rd. SW. During the search warrant of the residence agents discovered approximately 10 pounds of methamphetamine, field tested positive, hidden inside a kitchen cabinet of the residence. During the search of the bedroom occupied by MENDOZA, agents found her purse. Inside the purse agents found a loaded Smith and Wesson M&P 9mm handgun (Serial # HXF4697).
12. After GARIBALDI left the 6505 Churchill Rd. SW address, agents followed her. GARIBALDI eventually got onto Interstate 40 and travelled westbound. Agents requested the assistance of New Mexico State Police (NMSP) to conduct a traffic stop of GARIBALDI. NMSP officers utilized a trained narcotics K-9 to assist in the search of the vehicle. The K-9 alerted to a dark blue bag in the back seat of the vehicle for the presence of the odor of narcotics. This was the same bag that PERES carried inside his residence earlier in the day. Inside the dark blue bag agents discovered approximately \$2,410.00 USD in a side pocket of the bag.

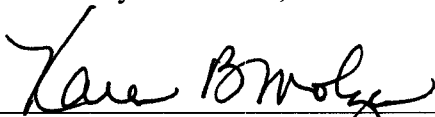
CONCLUSION

Based on the aforementioned facts, there is probable cause that on or about October 22, 2017, in the District of New Mexico, Raul Medas PERES, a.k.a. Jose Raul CAMPOS-Cardona and Sonia GARIBALDI-Bravo did violate 21 U.S.C. § 841 (a) (1) and (b) (1) (A), which prohibits any person knowingly or intentionally to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance, to wit; 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine. And, that Hope Lorraine MENDOZA did violate 21 U.S.C. § 846.



Jody L. Harrison
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me
this 23rd day of October, 2017.



The Honorable Karen B. Molzen
Chief United States Magistrate Judge